The Honorable James L. Robart

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

STONCOR GROUP, INC., Plaintiff, v. CHRISTOPHER CAMPTON, an individual, and HI-TECH INTERIORS, INC., Defendants.	)	No. CV05-1225 DECLARATION IN SUPPORT OF DEFENDANT'S MOTION TO COMPEL DISCOVERY

I, the undersigned, declare as follows:

1. I am one of the attorneys for the defendants, Christopher Campton, and Hi-Tech Interiors, Inc. I am competent to so testify.

2. This declaration is made for the purpose of introducing documents in support of Defendant's Motion to Compel Discovery.

3. Attached hereto are the following:

a. Defendant's Amended First Discovery Requests, dated July 20.

b. Answers to Defendant's First Discovery Requests, dated July 26, 2005.

c. [unverified] Supplemental Answers to Defendant's First Discovery Requests, dated July 26, 2005.

Davis Wright Tremaine LLP
LAW OFFICES
777 – 108TH Avenue NE · Suite 2300
Bellevue, Washington 98004-5149
(425) 646-6100 · Fax: (425) 646-6199

d. [unsigned and unverified] Answers to Defendant's Second Discovery Requests.

e. Letter from Boris Gaviria to Medora Marisseau, dated July 20, 2005.

f. Letter from B. Gaviria to M. Marisseau, dated July 27, 2005

g. Letter from B. Gaviria to Brian Keeley, dated October 6, 2005.

h Letter from Rhys M. Farren to B. Keeley, dated October 27, 2005. (note: this letter incorrectly bears a date of October 13.)

i. Plaintiff's Initial Disclosures.

j. Plaintiff's Expert Witness Disclosure.

4. On October 6, 2005, my associate Boris Gaviria and I engaged in a joint discovery conference with Brian Keeley by telephone at approximately 4 p.m. In response to the several unanswered discovery responses, Mr. Keeley indicated that he would look into the discovery issues.

5. After the October 6 conference, I received no further answers, responses, documents, disclosures or any other communication from plaintiff's counsel in furtherance of answering discovery. I have only received increasing demands for plaintiff's own discovery.

6. I have read the Facts section of the accompanying Motion to Compel. The statement of facts within this section is true and correct to the best of my knowledge and belief.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge, information and belief.

Signed at Bellevue, Washington, this 7th day of November, 2005.

Rhys M. Farren

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LAW OFFICES
777 – 108TH Avenue NE · Suite 2300
Bellevue, Washington 98004-5149
(425) 646-6100 · Fax: (425) 646-6199